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ROBINSON MCFADDEN  
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

September 26, 2005

**VIA HAND DELIVERY & EMAIL**

Charles L.A. Terreni, Chief Clerk  
Public Service Commission of South Carolina  
101 Executive Center Drive, Saluda Building  
Columbia, South Carolina 29210

**Bonnie D. Shealy**  
1901 MAIN STREET, SUITE 1200  
POST OFFICE BOX 944  
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(803) 779-8900 | (803) 227-1102 direct  
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bshealy@robinsonlaw.com

**Re: Generic Docket – Amendments to Interconnection  
Agreements/Change of Law  
Docket No. 2004-316-C  
Our File No. 30042-0003**

RECEIVED  
2005 SEP 26 PM 4:17  
SC PUBLIC SERVICE  
COMMISSION

Dear Mr. Terreni:

Please revise your records to reflect that Robinson McFadden & Moore, P.C. is now the attorney of record for SECCA in the above referenced docket. Enclosed for filing please a motion to substitute counsel signed by Ms. Flowers and me. By copy of this letter we are notifying all parties of record. Please stamp the extra copy provided as proof of filing and return it with our courier.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

*Bonnie D. Shealy*  
Bonnie D. Shealy

/bds  
Enclosure

cc/enc: Terry Romine, Deputy General Counsel (via email & U.S. Mail)  
Dan F. Arnett, Chief of Staff  
All parties of record  
Ms. Daphne Werts (via email)

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 2004-316-C

RECEIVED  
2005 SEP 26 PM 4:17  
SC PUBLIC SERVICE  
COMMISSION

In re:

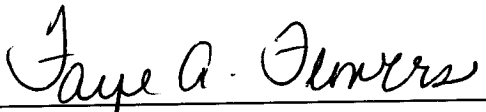
Petition to Establish Generic  
Docket to Consider  
Amendments to Interconnection  
Agreements Resulting  
From Changes of Law

MOTION TO SUBSTITUTE  
COUNSEL

Southeastern Competitive Carriers Association ("SECCA") moves for a substitution of counsel. SECCA requests that Faye A. Flowers, Esquire, of Parker, Poe, Adams & Bernstein, LLP be relieved as counsel in this action and that Bonnie D. Shealy, Esquire, of Robinson McFadden & Moore, P.C. be substituted as the attorney of record for SECCA.

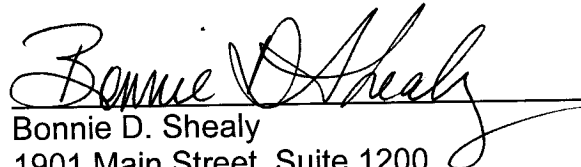
Dated this 26<sup>th</sup> day of September, 2005.

Parker, Poe, Adams, & Bernstein, LLP



Faye A. Flowers  
1201 Main Street, Suite 1450  
Columbia, South Carolina 29202  
Telephone (803) 255-8000

Robinson McFadden & Moore, P.C.



Bonnie D. Shealy  
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[Bshealy@robinsonlaw.com](mailto:Bshealy@robinsonlaw.com)

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2004-316-C

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In Re: )  
)  
Petition to Establish Generic )  
Docket to Consider Amendments to )  
Interconnection Agreements )  
Resulting From Changes of Law )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Mary F. Cutler, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the persons named below the **Motion to Substitute Counsel** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

John J. Pringle, Jr.  
Esquire, Ellis, Lawhorne & Sims, P.A.  
Post Office Box 2285  
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Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein, LLP  
Post Office Box 1509  
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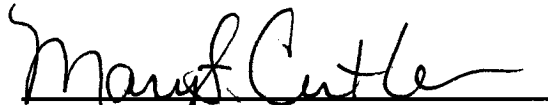
Darra W. Cothran, Esquire  
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Scott A. Elliott, Esquire  
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Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, PA  
P.O. Drawer 7788  
Columbia, SC 29202-7788

Florence P. Belser, General Counsel  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211

Dated at Columbia, South Carolina this 26<sup>th</sup> day of August 2005.

  
Mary F. Cutler